

Important: PCBs - Pechiney Site, City of Vernon

Carmen Santos to: Conlan, Linda Bcc: Steve Armann, Patrick Wilson

07/24/2009 04:01 PM

From:

Carmen Santos/R9/USEPA/US

To:

"Conlan, Linda" <Linda.Conlan@amec.com>

Bcc:

Steve Armann/R9/USEPA/US@EPA, Patrick Wilson/R9/USEPA/US@EPA

Greetings, Linda:

Earlier this week we sent the Pechiney risk-based disposal application (761.61(c)) for review to our EPA HQs. We have asked a 45-day review time. It could potentially take up to 60 days. I will keep you informed of our progress in reviewing the application.

Please call me if you have questions. Thank you for your patience.

Regards,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division **USEPA Region 9** 415.972.3360

fax: 415.947.3533

"Conlan, Linda"

Thank you for the update.

07/16/2009 05:57:14 PM

From:

"Conlan, Linda" <Linda.Conlan@amec.com>

To:

Carmen Santos/R9/USEPA/US@EPA

Date:

07/16/2009 05:57 PM

Subject:

RE: Important: Re: Pechiney Site, City of Vernon

Thank you for the update.

Linda

From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Thursday, July 16, 2009 4:32 PM

To: Conlan, Linda

Cc: Wilson.Patrick@epamail.epa.gov

Subject: RE: Important: Re: Pechiney Site, City of Vernon

Greetings, Linda:

Thank you for submitting the risk-based application for the Pechiney Site. I appreciate it. We will either conduct the review here in Region 9 or may send it to EPA HQs for review. I will let you know by July 20 where the review will be conducted.

Sincerely,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360

fax: 415.947.3533

From:

"Conlan, Linda" <Linda.Conlan@amec.com>

To:

Carmen Santos/R9/USEPA/US@EPA

Cc: Date: Patrick Wilson/R9/USEPA/US@EPA 07/15/2009 10:55 AM

Subject:

RE: Important: Re: Pechiney Site, City of Vernon

Carmen;

We prepared the risk-based application for the Pechiney Vernon site, and forwarded two hard copies of the document to your attention this week. In a separate submittal, we also included two CD copies of the document. Please let me know if you do not receive the documents this week.

Thank you, Linda Conlan, PG Senior II Geologist

AMEC Geomatrix, Inc.

510 Superior Avenue, Suite 200 Newport Beach, CA 92663 (949) 574-7083 (direct dial), (949) 355-3631 (cell) (949) 642-0245 (main), (949) 642-4474 (fax) linda.conlan@amec.com

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From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Friday, May 08, 2009 10:26 AM

To: Conlan, Linda

Cc: Wilson.Patrick@epamail.epa.gov

Subject: RE: Important: Re: Pechiney Site, City of Vernon

Greetings, Linda:

Thank you for your message.

Yes, please call me if you need assistance with TSCA requirements or other issues that may be related to the application. Regarding the risk evaluation portion of the application, I would have to consult any questions that you may have with Dr. Wilson, our Regional senior toxicologist; and Dr.Wilson will be out of the office several days next week.

I look forward to assisting you with the PCB issues at the Pechiney site.

Thank you for your courtesies and have a nice day.

Sincerely,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360

fax: 415.947.3533

From:

"Conlan, Linda" <Linda.Conlan@amec.com>

To:

Carmen Santos/R9/USEPA/US@EPA

Date:

05/07/2009 05:10 PM

Subject:

RE: Important: Re: Pechiney Site, City of Vernon

Carmen;

Thank you for getting back to me.

We are preparing the risk-based evaluation as you have recommended below. If I have any general questions regarding the CFR TSCA requirements/methods/application, etc. may I call you later next week.

Regards, Linda Conlan, PG Senior II Geologist AMEC Geomatrix, Inc. **From:** Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Thursday, May 07, 2009 11:34 AM

To: Conlan, Linda

Cc: Armann.Steve@epa.gov; Wilson.Patrick@epamail.epa.gov

Subject: Important: Re: Pechiney Site, City of Vernon

Greetings, Linda:

Thank you for your message asking status of EPA's comments on the FS/RAP regarding PCBs. The FS/RAP is a document that was submitted to DTSC.

I apologize for not getting back to you sooner.

Based on as brief review of the information that you submitted, it would be more expeditious that a risk based application be submitted to USEPA approval in accordance with 40 CFR 761.61(c) requirements. That application should fulfill the requirements in 40 CFR 761.61(a)(3) in addition to including the risk-based evaluations for PCB contamination at the site and in concrete. The application should be responsive to all the requirements in 40 CFR 761.61(a)(3) including 761.61(a)(3)(A) through (a)(3)(E). An evaluation of the existing PCB site characterization (extent, nature, sampling results) should be presented in the application demonstrating that site characterization conforms to the requirements in 40 CFR 761.61(a)(2). Based on a brief review of the information that you submitted, the information required in 40 CFR 761.61(a)(3) (including 761.61(a)(3)(A) through (D) is already available. The existing PCB risk evaluation that was submitted to DTSC, which is currently available, should be included in the risk-based disposal approval application required under 761.61(c). If in the course of our toxicologist review adjustments to the risk evaluation prepared for DTSC in relation to PCBs are found necessary, we will discuss such adjustments with you when we review the application.

Please include in the application a summary addressing any removals of PCB-contaminated soils to date, concentration of PCBs in the soil, volume disposed, and name of disposal site that received the waste. This includes any soil excavations and / or removals that may have been done at the site under the oversight of the CUPA and DTSC.

The certification required under 40 CFR 761.61(a)(3)(E) should consist of the language in the definition of "Certification" in 40 CFR 761.3 followed by the certification statement in 40 CFR 761.61(a)(3)(E). The certification is to be signed by the owner of the property subject to the cleanup and the party conducting the cleanup.

Finally, the risk based application should be submitted to USEPA for approval and addressed to:

Jeff Scott, Director

Waste Management Division USEPA Region 9 75 Hawthorne Street San Francisco, CA 94105

Please call me if you have any questions concerning this message. Thank you.

Sincerely,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360

fax: 415.947.3533

From:

"Conlan, Linda" <Linda.Conlan@amec.com>

To:

Carmen Santos/R9/USEPA/US@EPA

Date:

04/28/2009 10:33 AM RE: Pechiney Site

Subject:

Carmen:

We recently received comments from the DTSC regarding the FS/RAP (excluding the PCB portions of the document), so I thought that I would check in on the status of EPA's review and determination of the next steps? Please let me know if you need any additional information.

Thank you for all your help on this project.

Regards, Linda Conlan, PG Senior II Geologist AMEC Geomatrix, Inc.

Please update your contact information with my new email address <u>linda.conlan@amec.com</u>. My former email address <u>lconlan@geomtrix.com</u> is no longer available.

510 Superior Avenue, Suite 200 Newport Beach, CA 92663 (949) 574-7083 (direct dial) (949) 642-0245 (main) (949) 642-4474 (fax) (949) 355-3631 (cell) linda.conlan@amec.com

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From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Monday, March 23, 2009 1:35 PM

To: Conlan, Linda

Cc: Wilson.Patrick@epamail.epa.gov

Subject: Pechiney Site

Greetings, Linda:

Thank you for submitting the information on the Pechiney Site. I received the 2006 Notification and the RAP that Geomatrix submitted to USEPA and DTSC respectively. I appreciate getting the information and will contact you when Patrick Wilson (USEPA Senior Toxicologist) and I complete our review. We anticipate letting you know our findings and will advise on next steps. Thank you

Sincerely,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360

fax: 415.947.3533

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